

**Importance:** High

-----Original Message-----

**From:** Wil [mailto:wil@galaxynet.com]  
**Sent:** Thursday, July 15, 2004 8:26 AM  
**To:** Struhsaker Georgia  
**Subject:** Fw: Grounding of M.V. Le Conte on Cozian Reef  
**Importance:** High

Hello again Georgia,

Wil Petrich here,

I am wondering if you've received this E mail? I know that according to what I was told by the Anchorage office, that you've been in transition to the Seattle office, so I am resending this e mail in the event that it got lost in the shuffle.

I look forward to hearing from you.

Best regards,

Wil Petrich

----- Original Message -----

**From:** [Wil](#)  
**To:** [Georgia Snyder](#)  
**Sent:** Wednesday, June 16, 2004 4:37 PM  
**Subject:** Fw: Grounding of M.V. Le Conte on Cozian Reef

Greetings again Georgia,

This is a slightly revised and hopefully more readable version of my first E mail to you, along with a couple of pertinent attachments.

I look forward to meeting with you in the near future to discuss these issues in greater depth.

Sincerely,

Wil Petrich

----- Original Message -----

**From:** [Wil](#)  
**To:** [Georgia Snyder](#)  
**Sent:** Wednesday, June 16, 2004 10:59 AM  
**Subject:** Grounding of M.V. Le Conte on Cozian Reef

Greetings Georgia;

Wil Petrich here,

As you may well remember, I was the mate at the Con of the AMHS Ferry M.V. Le Conte when it grounded on Cozian Reef.

Now that the USCG has had their day and AMHS has had their day (I have been terminated by AMHS and have an 8 month suspension of my License from the USCG) I feel compelled to comment.

I feel that the fatigue issue has not been properly dealt with. I had, at best, 13.5 hrs. sleep in the preceding 72 hrs. It has become apparent to me that neither the USCG nor AMHS feel it was a factor. I however feel it was a significant contributing factor. In reviewing prior incidents in the last 10 years with AMHS I find a common thread, and that thread is fatigue. What has become apparent to me in reviewing research and articles on fatigue in the work place, is that the 4 1/2 hrs sleep that navigating officers get each off watch, on the average, is entirely inadequate for safe navigation and piloting in ISM class 3 and 4 waters. (near dangers and harbors)

AMHS operates in these waters 24/7.

When I reflect on actual incidents and the many near misses that I and other officers have been witness to on AMHS vessels (these don't get into the log books) it becomes obvious that it will only be a matter of time before a major incident involving loss of life will occur.

In a sense we mitigated that probability somewhat via my own parameters for transit of that area. As I stated to USCG it is a route I would only use in clear weather and daylight hours, with little wind and no opposing traffic. It still could have had disastrous consequences had we struck a reef or a glancing blow down the side of the ship rather than impacting head on. That thought gives me chills!

The insidious thing about fatigue in its initial stages is that one is not aware of its presence.

The tragedy is that there are solutions that could be enacted virtually immediately to vastly mitigate the chances of such an occurrence happening again.

Suspending my license while exacting punishment on the part of the USCG and AMHS terminating and exacting retribution (whether warranted or not) have done nothing to address the issue of fatigue and future consequences of not dealing with it..

As individuals, mates and masters with AMHS, including myself have time and again approached AMHS management and the USCG about work/rest issues, fatigue and the probability of such an incident occurring if nothing is done to remediate the issue. We have memorialized via letter numerous such entreaties. They have all been categorically rebuffed. The USCG, for their part have been unwilling to get involved.

I have nothing at this point to lose or gain so I intend to pursue this issue. I suspect it is one that will only increase in the coming years as the administrative

burdens imposed by regulatory requirements increases on watchstanding and non watchstanding mates and masters .

Ironically, the chief investigating officer for the USCG made his pitch for the settlement agreement (implied threat) that if I were to contest to the ALJ they would charge me with "misconduct" for violation of AMHS safety rules. He stated that since the vessel was considered over 1600 tons (3200 ITC Tons) I should have maintained a continuous plot! That is a practical impossibility as any pilot will tell you, due to the inability to plot other than a historical plot because of lack of personnel and the necessity of the person having the con of the ship to stay on the centerline with visual reference at all times. Now there is a way to provide a continuous plot that could be of immediate use and that would be to have "ECDIS" (Electronic Chart Display) with radar overlay at the con. I can assure you that even in my "Dopey" state had I had ECDIS with virtual real-time plotting at the con I would not have made that grievous navigational error or at the very least would have caught it in time to avert that grounding.

The same investigating officer would with a straight face also tell you that ECDIS is not required because of class and tonnage (under 1600 Gross tons US). This quickly becomes a case of imposing only minimal regulatory requirements. A like example would be the USCG minimum manning requirement for the Ferry Columbia (and indeed all AMHS vessels.) Why do we carry more than minimum manning on all vessels? Very simply, because we could not possibly deploy all the lifesaving appurtenances. IE.: -Rafts Chutes Lifeboats and Fast rescue Boat with minimum manning mandated by USCG> It comes down to that historical dictum "Safety Of The Ship"!

The other fix that is quite doable and perhaps more important would be to impose a 4 on 8 off watch on all these vessels and mandate that the chief mate be a non-watch stander and that Nav. Officers be dedicated solely to the navigation of the vessel! The obligatory paperwork and administrative burden imposed on a watch standing chief mate is such (due ironically to record keeping requirements of AMHS, ISM and such) means the practical reality is that a watch standing chief mate only gets, at best, 4/ 1/2 hours of sleep in one off watch for every 24 hours!

I would be glad to testify or to help in any way that I might if would help effect a real world change in this unacceptable situation. I live on Whidbey Island and understand that you will soon be working out of the Seattle NTSB Office. It would be my pleasure to meet with you once you are situated there.

At your service,  
Wil Petrich